

## **Moran, David**

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**From:** Moran, David  
**Sent:** Tuesday, April 9, 2024 3:13 PM  
**To:** MCCALLUM, Robert  
**Cc:** Nilsson, William (DAL); SESSIONS, Justina (JKS); BOSCO, Veronica; SALEM, Sara; VACA, Lauren; Paul Yetter; Bracewell, Mollie; Bradley Justus; dpearl@axinn.com; Zeke DeRose; geraldine.young@nortonrosefulbright.com; Peter M. Hillegas; Marc B. Collier  
**Subject:** RE: Texas v. Google -- Joint request regarding page limits and deadlines

Counsel:

Thank you for reaching out with the requests below.

I applaud the professionalism of working together with respect to these briefing and scheduling issues.

The requests are GRANTED.

Thank you.

David

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**From:** MCCALLUM, Robert <rob.mccallum@freshfields.com>  
**Sent:** Tuesday, April 9, 2024 2:52 PM  
**To:** Moran, David <dmoran@jw.com>  
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**Subject:** Texas v. Google -- Joint request regarding page limits and deadlines

**Caution: \*\*External Email.**

Special Master Moran:

The parties have met and conferred in advance of filing their respective briefs today and jointly submit the following request for the Special Master's consideration.

The Special Master's Order dated April 8, 2024 permitted Google to file a motion for a protective order regarding high level executives and in house counsel depositions of no more than 20 pages (in addition to an opening brief of 10 pages). As discussed with Plaintiffs, Google is also proposing to file a separate motion for a protective order regarding discovery-on-discovery issues, as part of which Google will address in house counsel depositions.

As a result, Google is proposing to file (1) an opening brief (of no more than 7 pages); (2) a motion for a protective order regarding high level executives (of no more than 15 pages); and (3) a motion for a protective order regarding discovery-on-discovery issues and in house counsel depositions (of no more than 12 pages). Plaintiffs are proposing to file a single opening brief (of no more than 12 pages).

Plaintiffs do not oppose Google's request to file three briefs with the above page limits. Google does not oppose Plaintiffs' request for the above page limit. In light of the additional briefing requested, the parties jointly request that the deadline for all responsive briefs be moved to Monday April 15, 2024 at 5pm CT and that the parties have an equal number of pages to respond.

Thank you for your consideration.

Respectfully,  
Robert J. McCallum

**Rob McCallum**  
Of Counsel

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